



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**BENJAMIN MOORE AND COMPANY FACILITY
MELROSE PARK, ILLINOIS
ILD 005 457 155**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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EXECUTIVE SUMMARY

Dynamac Corporation (Dynamac) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Benjamin Moore & Company (BMC) facility in Melrose Park, Illinois. This summary highlights the results of the PA/VSI and the potential releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The BMC facility was vacant land prior to the 1950s. In 1952, BMC built the facility and since that time has manufactured alkyd and latex resins, and house and trade-sale paints at this location. Operations include mixing, thinning, blending, and container filling. The hazardous waste streams generated and managed at the facility since operations began are dilute caustic sludge (D030, D033); off-specification paint (D001); off-specification resin (D001); and off-specification fire-retardant paint (D019, D032). The facility also generated waste styrene as a one-time waste in 1992; at the time of the VSI, the facility was waiting for analytical results to determine appropriate waste code(s) for this waste. In addition, the facility generated contaminated soil (U239) during clean-up activities associated with a xylene spill at the facility in 1988. The nonhazardous wastes generated at the facility since operations began are nonhazardous off-specification paint and baghouse dust.

BMC employs approximately 200 people at this facility, 85 of whom work in areas where manufacturing operations are conducted. The facility occupies approximately 14 acres in a mixed industrial/commercial area. The facility consists of a paint manufacturing plant, a resin manufacturing plant, a tank farm and loading area, and a paved parking area.

In 1952, BMC also built a second facility on the property located immediately east of BMC's facility. BMC owns the property and the buildings at the second facility, but Technical Coatings, Inc. (TCI), leases the buildings and property from BMC. TCI is a wholly-owned subsidiary of BMC; however, TCI filed its own Part A permit application (Part A) in 1980, and operates its facility under a separate EPA identification number from BMC and manages its own wastes.

BMC submitted a Part A permit application for interim status as a storage facility to the U.S. Environmental Protection Agency (EPA) in November 1980. The Part A identified the Former Drummed Waste Storage Area (SWMU 5) and the Former Dilute Caustic Sludge Aboveground Storage Tank (AST) Location (SWMU 6) at the facility. In 1985, the Illinois Environmental Protection Agency (IEPA) conducted a closure inspection at the facility, and approved the facility's closure activities for SWMU 5. However, this inspection did not address the status of SWMU 6. The facility has been regulated under RCRA as a large-quantity generator of hazardous wastes since the 1985 IEPA closure inspection.

The PA/VSI identified the following seven SWMUs and five AOCs at the facility:

Solid Waste Management Units

1. Dilute Caustic Sludge AST
2. Dilute Caustic Sludge Bin
3. Drummed Waste Storage Area
4. Baghouse Collection Drums
5. Former Drummed Waste Storage Area
6. Former Dilute Caustic Sludge AST Location
7. Former Dilute Caustic Sludge Bin

Areas of Concern

1. Fuel Oil Underground Storage Tank (UST) Area
2. Former Diesel Fuel USTs Area
3. Alleged Drum Burial Area No. 1
4. Alleged Drum Burial Area No. 2
5. Alleged Drum Burial Area No. 3

The potential for a release to on-site soil, ground water, surface water, or air from SWMUs 1, 3, 4, 5, 6, and 7 is low. SWMU 1 manages hazardous waste in a closed steel AST on a concrete pad surrounded by a 2-foot steel berm. SWMU 3 manages waste in closed 55-gallon steel drums situated on wood pallets on an asphalt surface. SWMU 4 manages nonhazardous waste indoors in closed 55-gallon steel drums connected to an enclosed dust collection system. SWMU 5 managed waste in closed 55-gallon steel drums on an asphalt surface; this unit underwent IEPA-approved RCRA closure in 1985. SWMU 5 continued to manage waste for less than 90 days until it became inactive in 1989. SWMU 6 managed hazardous waste in a closed steel AST on a concrete pad surrounded by a 2-foot concrete berm. This unit became inactive in 1984, when the facility moved it to a new location (SWMU 1). SWMU 7 managed volatile waste in an open steel bin on an asphalt surface. Although there was a high potential for historical release to air from this unit, the unit has been inactive since 1976 and no longer exists at the facility. All drains located throughout the facility are equipped with an alarm system that shuts off the valve to the drain and notifies the Melrose Park Fire Department when the alarm detects volatile organic compounds (VOC). No releases have been documented from any SWMUs at the BMC facility.

SWMU 2 manages dilute caustic sludge (D030, D033), a volatile substance, on an asphalt surface in a steel bin with a steel lid. There is a low potential for a release to on-site soil, ground water, and surface water from SWMU 2. At the time of the VSI, the steel lid was slightly ajar at one end to accommodate a hose entering the unit. Although Dynamac did not detect any odors in the general vicinity of the unit, there is a high potential for a release to the air from this unit.

There is a moderate potential for a release to on-site soil, ground water, and surface water from AOCs 1 and 2. AOC 1 contains a 20,000-gallon steel UST. The UST was formerly used to store fuel oil, and was cleaned out and filled with concrete in 1986. AOC 2 consists of an area that formerly contained two 2,000-gallon steel USTs used to store diesel fuel. These USTs were removed and disposed of in 1985. Facility representatives were unable to recall if BMC ever conducted a leak test or collected soil samples at either AOC 1 or AOC 2. There was no documentation available in EPA, IEPA, or facility files indicating whether the facility conducted a leak test or collected soil samples at either AOC 1 or 2 to verify whether contamination from any of the USTs impacted the surrounding soil. The soil in the area of AOCs 1 and 2 consists of sandy glacial drift. The depth to ground water is likely to be less than 10 feet and the direction of ground water flow is likely to be toward Silver Creek, which is located approximately 0.25 miles north of the facility. There is a low potential for a release to the air from AOCs 1 and 2 because the USTs in each area were located beneath the ground.

In a March 1991 letter to EPA, an employee of TCI alleged that between 15 and 16 years ago, BMC and/or TCI buried drums of solvent-based black enamel and other hazardous materials at AOCs 3, 4, and 5. Facility representatives were unaware of the allegations or of any waste ever being buried at the facility. During a telephone conversation with Dynamac subsequent to the VSI, Thad Slaughter, RCRA Enforcement Branch, EPA, stated he had reviewed the file information for both BMC and TCI. However, due to the time frame in which the alleged activities took place (mid-1970s/pre-RCRA), his division could not recommend any further investigation. Mr. Slaughter stated he delivered the file information to the Superfund Division. The Superfund Division determined it could not warrant any further investigation of BMC and TCI under its jurisdiction due to a lack of environmental receptors that might be affected by a release from the alleged buried drums. There has been no further investigation or documentation of whether or not the allegations are factual. If these allegations are factual, there is a high potential for a release to on-site soil from each of these AOCs. There is also a moderate potential for a release to ground water and surface water from AOCs 3, 4, and 5 if the allegations are factual. As mentioned previously, the soils in the area of the facility consist of sandy glacial drift, and the depth to ground water and the direction of ground water flow are likely to be less than 10 feet and north toward Silver Creek, respectively. There is a low potential for a release to the air from AOCs 3, 4, and 5 because the hazardous material is alleged to be buried beneath the ground.

Ground water in the area of the facility is not used as a drinking water source. According to Rocco Campanelli, Supervisor, Melrose Park Department of Public Works, there are no active drinking water or industrial ground water wells located within the village limits.

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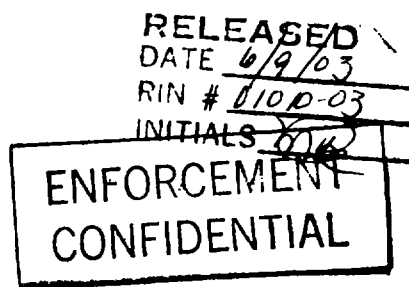
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Surface water runoff from the facility is collected by numerous storm drains located throughout the facility. Each storm drain is equipped with an alarm that automatically closes a valve in the drain and notifies the Melrose Park Fire Department if the alarm detects VOCs. The storm drains discharge to Silver Creek, the nearest surface water body, which is located approximately 0.25 miles northeast of the facility. Silver Creek is not used for any other industrial purposes, or for recreational or drinking water purposes. Silver Creek discharges to the Des Plaines River approximately 2 miles southeast of the facility. The Des Plaines River is used for recreational fishing and receives treated industrial discharge via National Pollutant Discharge Elimination System (NPDES) permits, as well as non-treated storm water discharge. The Des Plaines River is not used for swimming or drinking water purposes. The other surface water bodies within two miles of the facility include Addison Creek and three man-made excavated ponds. Addison Creek is located approximately 1.25 miles southwest of the facility and is not used for recreational, industrial, or drinking water purposes. Each of the ponds is less than 2 acres in size; one is located about 1 mile southwest of the facility, one is located about 1.25 miles east of the facility, and the other is located about 1.5 miles east of the facility.

The nearest sensitive environments are the Des Plaines River and Addison Creek. There are also 4 temporarily flooded, forested ponds located about 2 miles northeast of the facility, along the Des Plaines River. Each of these ponds is approximately 20 acres in size.

Access to the facility is controlled by a 6-foot-high chain-link fence and an electronic security system. The nearest residences are located approximately 0.1 miles southeast of the facility. The nearest school, Stevenson School, is located approximately 0.5 miles southeast of the facility. There are 10 other schools located within 2 miles of the facility.

Dynamac recommends the facility modify the lid of SWMU 2 so releases of volatile constituents to the air are limited. Dynamac recommends the facility either provide documentation that it has already conducted IEPA-approved RCRA closure of SWMU 6, or conduct RCRA closure of SWMU 6 and submit certification of closure activities to IEPA for approval. Dynamac also recommends either the facility provide documentation verifying it conducted a leak test of the USTs at AOCs 1 and 2 prior to cleaning and removal activities; or conduct soil sampling in the area of AOCs 1 and 2 to verify that potential contaminants have not impacted the surrounding soil. Dynamac further recommends the facility provide documentation showing the allegations involving AOCs 3, 4, and 5 are false or conduct soil sampling in the areas alleged to contain buried hazardous material to verify that the allegations are false.



1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in EPA Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Benjamin Moore & Company (BMC) facility in Melrose Park, Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, containers, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents in files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of the PA/VSI of the BMC facility (EPA ID No. ILD 005 457 155) located in Melrose Park, Cook County, Illinois. The PA was completed on September 3, 1992. Dynamac gathered and reviewed information from files at the Illinois Environmental Protection Agency (IEPA) Springfield, Illinois, office and from EPA Region 5 RCRA files. In addition, Dynamac gathered information from the Federal Emergency Management Agency (FEMA), National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of the Interior (USDI), and the U.S. Geological Survey (USGS).

Deborah Hall and Joseph Weslock of Dynamac conducted the VSI on September 9, 1992. The VSI included an interview with facility representatives and a walk-through inspection of the facility. Dynamac identified seven SWMUs and five AOCs at the facility. Dynamac completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized along with six inspection photographs in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The BMC facility is located on the northeast corner of the intersection of 25th and North Avenues in Melrose Park, Cook County, Illinois (latitude 41° 54' 34" N and longitude 87° 51' 56" W) (BMC, 1980b; USGS, 1963), as shown in Figure 1. The facility occupies about 14 acres in a mixed industrial/commercial area.

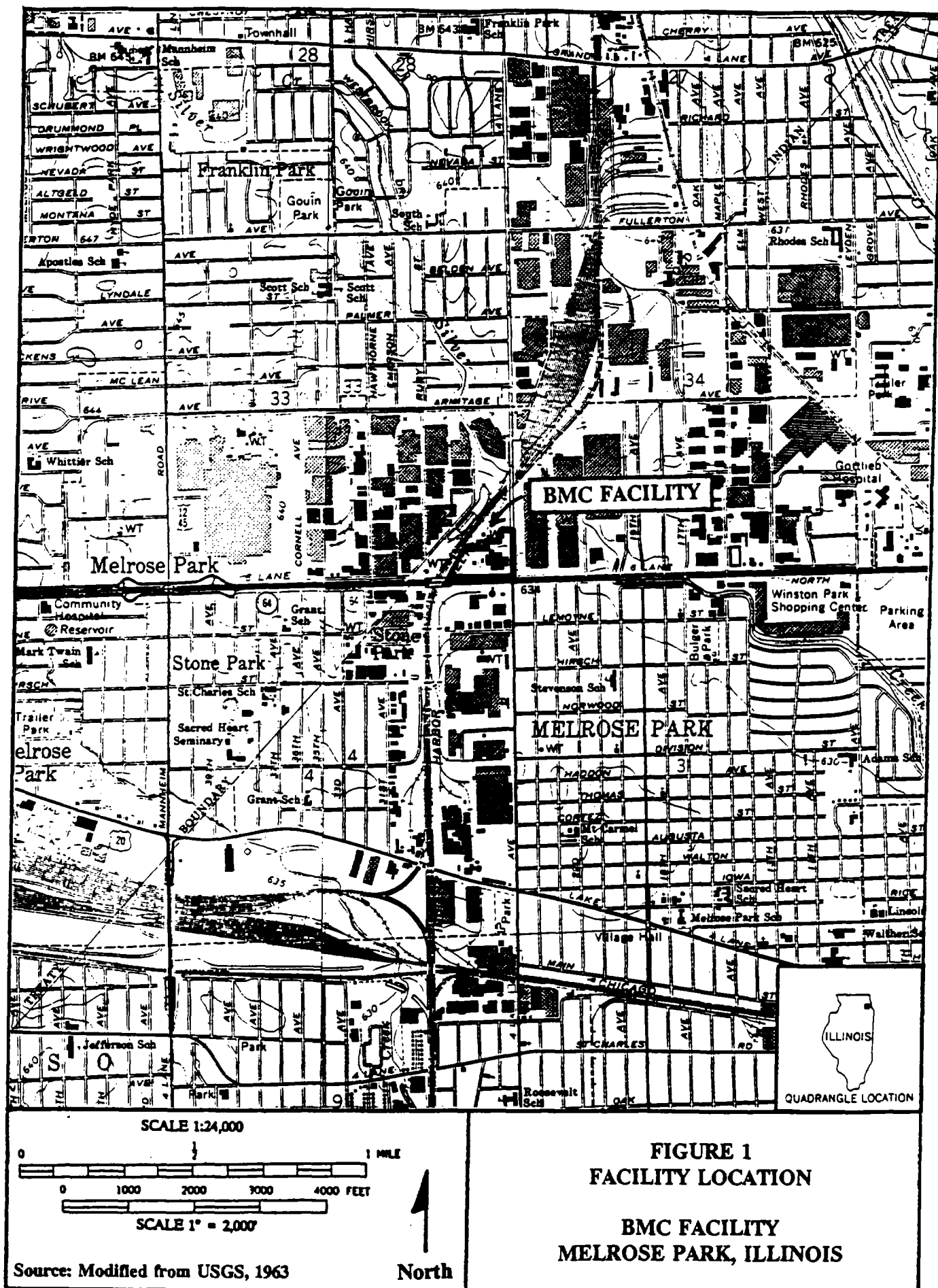
The facility is bordered on the north by a gravel company, an Alberto Products facility, and a park owned by the Melrose Park Park District; on the south by North Avenue; and on the west the Indian Harbor Belt Line rail line. The facility is bordered on the east by a Technical Coatings, Inc. (TCI), facility. TCI is a wholly-owned subsidiary of BMC, and TCI's Melrose Park property and buildings are leased from BMC. TCI filed its own Part A permit application (Part A) in 1980; TCI operates its facility under a separate EPA identification number from BMC and manages its own wastes.

2.2 FACILITY OPERATIONS

The facility was vacant land prior to the 1950s. In 1952, BMC built the facility and since that time has manufactured alkyd and latex resins, and house and trade-sale paints at this location. Operations include mixing, thinning, blending, and container filling. BMC uses a variety of raw materials including "Triton 405," and various acrylics, solvents, oils, and powdered pigments during manufacturing operations. BMC stores the triton 405 and much of the solvents and oils in aboveground storage tanks (AST) at the facility. BMC stores the powdered pigments in bags located indoors at the facility, and the acrylics and other raw materials in 55-gallon steel drums also located indoors at the facility.

BMC employs approximately 200 people at this facility, 85 of whom work in the manufacturing plants. The facility occupies approximately 14 acres and consists of a paint manufacturing plant, a resin manufacturing plant, a raw material warehouse, a tank farm, and a paved parking area. Access to the facility is controlled by a 6-foot-high chain-link fence and an electronic security system.

Solid waste generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.



2.3 WASTE GENERATION AND MANAGEMENT

The hazardous waste streams generated and managed at the facility since operations began are dilute caustic sludge (D030, D033); off-specification paint (D001); off-specification resin (D001); and off-specification fire-retardant paint (D019, D032). The facility also generated waste styrene as a one-time waste in 1992; at the time of the VSI, the facility was waiting for analytical results to determine appropriate waste code(s) for this waste. In addition, the facility generated contaminated soil (U239) during clean-up activities associated with a xylene spill at the facility in 1988. The nonhazardous wastes generated at the facility since operations began are nonhazardous off-specification paint and baghouse dust.

Wastes are generated and managed at numerous locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs and AOCs in relation to the facility layout are shown in Figure 2. Wastes generated and managed at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes is discussed below.

The facility annually generates approximately 10,000 gallons of dilute caustic sludge (D030, D033) from cleaning machinery at the paint manufacturing plant and the resin manufacturing plant, and from recycling process water from paint manufacturing operations in a process water distillation unit. Dynamac notes that although the facility calls this waste dilute caustic sludge, analysis of the waste indicates it does not meet the characteristic requirements for caustic (D002) under RCRA. The facility collects dilute caustic sludge generated from cleaning machinery at the paint manufacturing plant and from the process water distillation unit in the 7,500-gallon Dilute Caustic Sludge AST (SWMU 1). The facility collects dilute caustic sludge generated from cleaning machinery at the resin manufacturing plant in the 2,700-gallon Dilute Caustic Sludge Bin (SWMU 2). From the mid-1970s to 1984, the facility collected dilute caustic sludge from both the paint manufacturing plant and the resin manufacturing plant at the Former Dilute Caustic Sludge AST Location (SWMU 6). Prior to the mid-1970s, the facility collected this waste at the Former Dilute Caustic Sludge Bin (SWMU 7). SET Environmental, Inc. (SET), of Wheeling, Illinois, transports this waste off site to a Heritage Environmental Services, Inc. (Heritage), facility in Indianapolis, Indiana, for treatment and landfilling.

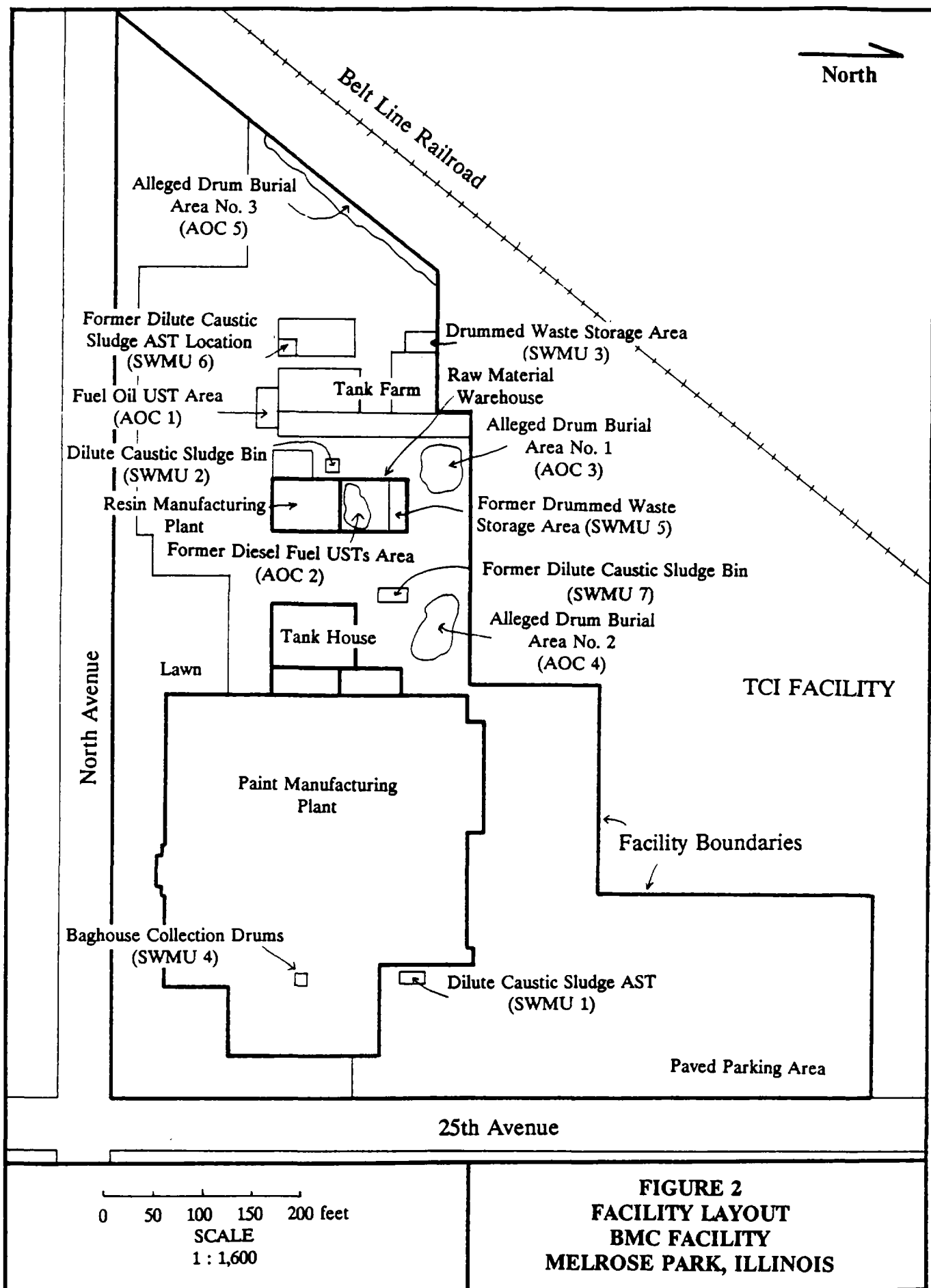
The facility annually generates approximately 4,900 gallons of off-specification paint (D001) during operations at the paint manufacturing plant. The facility collects this waste in 55-gallon steel drums and transfers the drums to the Drummed Waste Storage Area (SWMU 3) prior to shipping the waste off site. From the early 1970s to 1989, the facility transported 55-gallon steel drums containing this waste to the Former Drummed Waste Storage Area (SWMU 5) prior to shipping the waste off site. SET of Wheeling, Illinois, transports this waste off site to a Treatment One facility in Houston, Texas. Treatment One then ships the waste to another facility for fuel blending. There was no information available during the VSI interview, nor in EPA, IEPA, or facility files concerning the name and location of the ultimate disposal facility for this waste.

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit ^a	Status
1	Dilute Caustic Sludge AST	No	Active for storage of hazardous waste for less than 90 days
2	Dilute Caustic Sludge Bin	No	Active for storage of hazardous waste for less than 90 days
3	Drummed Waste Storage Area	No	Active for storage of nonhazardous wastes and less than 90-day storage of hazardous wastes
4	Baghouse Collection Drums	No	Active for accumulation of nonhazardous waste
5	Former Drummed Waste Storage Area	Yes	Inactive; RCRA closed in 1985
6	Former Dilute Caustic Sludge AST Location	Yes	Inactive
7	Former Dilute Caustic Sludge Bin	No	Inactive

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Source: modified from BMC, 1982b

**TABLE 2
SOLID WASTES**

Waste/EPA Waste Code ^a	Source	Solid Waste Management Unit
Dilute caustic sludge/ D030, D033	Cleaning operations	1, 2, 6, 7
Off-specification paint/ D001	Paint manufacturing operations	3, 5
Off-specification resin/ D001	Resin manufacturing operations	3, 5
Off-specification fire-retardant paint/D019, D032	Off-specification product	3
Waste styrene/not yet determined ^b	Off-specification raw material	3
Contaminated soil/U239	Clean-up activities	3
Nonhazardous off-specification paint/NA	Paint manufacturing operations	3, 5
Baghouse dust/NA	Paint manufacturing operations	4

Note:

^a Nonapplicable (NA) designates nonhazardous waste.

^b At the time of the VSI, the facility was waiting for analytical results of this one-time waste to determine the appropriate waste code(s) for the waste.

The facility annually generates approximately 1,900 gallons of off-specification resin (D001) during operations at the resin manufacturing plant. The facility collects this waste in 55-gallon steel drums and transfers the drums to the Drummed Waste Storage Area (SWMU 3) prior to shipping the waste off site. From the early 1970s to 1989, the facility transported 55-gallon steel drums containing this waste to the Former Drummed Waste Storage Area (SWMU 5) prior to shipping the waste off site. SET of Wheeling, Illinois, transports this waste off site to a Treatment One facility in Houston, Texas. Treatment One then ships the waste to another facility for fuel blending. There was no information available during the VSI interview, nor in EPA, IEPA, or facility files concerning the name and location of the ultimate disposal facility for this waste.

The facility also occasionally generates off-specification fire retardant paint (D019, D032). The facility receives fire-retardant paint as a finished product from a BMC facility at a different location. In the event a batch of this material does not meet the product specifications, the Melrose Park BMC facility disposes of the off-specification fire-retardant paint rather than transporting it back to the original BMC facility, and thus becomes the generator of the waste. The facility last generated this waste in 1991, when the facility disposed of approximately 3,700 gallons of this waste. The facility collected this waste in 55-gallon steel drums and transferred the drums to the Drummed Waste Storage Area (SWMU 3) prior to shipping the waste off site. SET of Wheeling, Illinois, transported the waste off site to Thermalkem, Inc., in Rock Hill, South Carolina. There was no information available during the VSI interview, nor in EPA, IEPA, or facility files concerning the ultimate disposal method of this waste.

The facility generated approximately 55 gallons of waste styrene as a one-time waste in 1992. This waste consists of a raw material drum containing styrene that polymerized prematurely and was unusable. The facility is currently awaiting analytical results of a sample of this waste to determine the appropriate waste code(s), transporter, disposal facility, and method of disposal. At the time of the VSI, the facility was storing this waste in the Drummed Waste Storage Area (SWMU 3).

The facility generated 605 gallons of contaminated soil (U239) during clean-up activities associated with a xylene spill in 1988. The facility stored this waste in the Drummed Waste Storage Area (SWMU 3) prior to shipping the waste off site. SET transported the waste off site to Marine Shale Processors, Inc., in Morgan City, Louisiana, for incineration (BMC, 1988).

The facility annually generates approximately 500 gallons of nonhazardous off-specification paint during operations at the paint manufacturing plant. The facility collects this waste in 55-gallon steel drums and transfers the drums to the Drummed Waste Storage Area (SWMU 3) prior to shipping the waste off site. From the early 1970s to 1989, the facility transported 55-gallon steel drums containing this waste to the Former Drummed Waste Storage Area (SWMU 5) prior to shipping the waste off site. SET of Wheeling, Illinois, transports this waste off site to Liquid Waste Disposal, Inc., in Calvert City, Kentucky, for landfilling.

The facility generates approximately 75 gallons of nonhazardous baghouse dust monthly during paint manufacturing operations. The facility collects this waste in 55-gallon steel Baghouse Collection Drums (SWMU 4). The facility then empties the Baghouse Collection Drums into a municipal garbage dumpster containing other municipal garbage from the facility. Clearing Disposal, Inc., transports this waste off site to Green Valley Landfill in Naperville, Illinois, for landfilling.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the BMC facility.

On October 6, 1988, a BMC employee noticed a pump seal was leaking xylene onto a concrete pad surrounded by an earthen berm at the tank farm in the western half of the facility. The facility estimated between 50 and 200 gallons of xylene leaked to the pad before the employee observed the leak and shut down the pump. The facility notified the National Response Center, the IEPA, the Melrose Park Environmental Department (MPED), and the Illinois Emergency Disaster Agency (Incident No. 881322). In an October 28, 1988, report from the facility to the MPED, the facility stated the spill was contained and no xylene went into the city sewer system. The facility removed eleven 55-gallon drums of contaminated soil from the earthen berm. The facility used visual and olfactory evidence to determine that all contaminated soil had been removed from the area. Based upon analysis of seven soil samples collected from the drums, the facility disposed of the contaminated soil as a hazardous waste (U239). SET of Wheeling, Illinois, transported the contaminated soil (U239) off site to Marine Shale Processors, Inc., in Morgan City, Louisiana, for incineration (BMC, 1988). During a telephone conversation with Dynamac following the VSI, Scott Owens, Emergency Response Unit, IEPA, stated the Agency granted the facility "clean closure" for Incident No. 881322 on December 2, 1988 (Dynamac, 1992d).

No other releases at the facility have been documented in EPA, IEPA, or facility files. However, an employee of TCI contacted the EPA in March 1991 through an attorney, and alleged BMC and/or TCI buried drums of hazardous waste at three locations at the facility. The employee alleged these activities took place between 15 and 16 years ago. According to the employee, drums of solvent-based black enamel were buried at the Alleged Drum Burial Area No. 1 (AOC 3), located northwest of the resin manufacturing plant and the raw material warehouse at the facility. The employee also claimed drums of hazardous waste were buried at the Alleged Drum Burial Area No. 2 (AOC 4), located northwest of the paint manufacturing plant, and at the Alleged Drum Burial Area No. 3 (AOC 5), located along the west border of the facility (DAKH, 1991). There was no information available in EPA or IEPA files at the time of the PA/VSI regarding the type of hazardous waste alleged to be buried at AOCs 4 and 5. During a telephone conversation with Dynamac, Thad Slaughter, RCRA Enforcement Branch, EPA, stated he had received the letter from the attorney representing TCI's employee regarding the allegations and had

reviewed the EPA file information for both BMC and TCI. However, due to the time frame in which the alleged activities took place (pre-RCRA), his division could not recommend any further investigation. Mr. Slaughter stated he delivered the letter and the file information to the Superfund Division. The Superfund Division determined it could not warrant any further investigation of BMC and TCI under its jurisdiction due to a lack of environmental receptors that might be affected by a release from the alleged buried drums (Dynamac, 1992b). Henry Placke, Plant Operations Manager at BMC, stated he was unaware of the allegations. Mr. Placke also stated he had asked several BMC employees who have been employed with BMC for greater than 15 years about the allegation, each of whom were unaware of any waste ever being buried at the facility. There was no further information concerning the allegations available in EPA, IEPA, or facility files at the time of the PA/VSI.

2.5 REGULATORY HISTORY

BMC submitted a Notification of Hazardous Waste Activity (Notification) for the facility to EPA on August 11, 1980 (BMC, 1980a). BMC submitted a Part A to EPA on November 10, 1980. The Part A listed the following process codes and capacities: S01 (3,300 gallons) and S02 (7,700 gallons). The S01 unit referred to the Former Drummed Waste Storage Area (SWMU 5) and the S02 unit referred to the Former Dilute Caustic Sludge AST Location (SWMU 6). The Part A listed the following wastes and estimated annual waste quantities: K078 (10,000 pounds); K079 (90,000 pounds); K081 (1,000 pounds); K082 (3,000 pounds); D001 (6,000 pounds); D005, D006, D008 (9,000 pounds) (BMC, 1980b).

BMC requested withdrawal of its Part A from the IEPA on July 29, 1983 (BMC, 1983). IEPA conducted an inspection of the facility on August 7, 1985, and found BMC had conducted closure activities with respect to its interim status S01 storage unit (Former Drummed Waste Storage Area - SWMU 5) in accordance with its IEPA-approved closure plan (IEPA, 1985). The closure inspection report did not indicate whether IEPA also inspected and approved the facility's S02 storage unit (Former Dilute Caustic Sludge AST Location - SWMU 6). The facility has been regulated as a large-quantity generator of hazardous waste under RCRA since the August 1985 IEPA inspection (EPA, 1985).

The facility has had some RCRA compliance problems. During an IEPA RCRA compliance inspection at the facility on April 27, 1982, IEPA cited the facility for paperwork deficiencies pertaining to hazardous waste manifests, weekly inspection logs and training records (IEPA, 1982). There was no information available during the VSI inspection, nor in EPA, IEPA, or facility files at the time of the PA/VSI concerning whether the facility ever corrected the deficiencies or whether the EPA or IEPA ever approved of any attempts by the facility to correct the violations. There were no copies of any subsequent RCRA compliance inspection reports available in EPA, IEPA, or facility files at the time of the PA/VSI.

The facility has an operating air permit (No. 72100394) which covers emission sources from heating and manufacturing equipment, as well as from the baghouse at the facility

(IEPA, 1989). There was no information available during the VSI interview, nor in EPA, IEPA, or facility files regarding any air quality inspections and/or violations at the facility. There is no history of odor complaints regarding the facility.

The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit and there has not been any CERCLA (Superfund) activity at the facility. Prior to 1982, the facility had an asbestos permit (No. A7207002), because some of the talcs used during manufacturing operations prior to 1982 contained asbestos (BMC, 1982a). None of the raw materials used at the facility since 1982 contain asbestos.

The facility installed one 20,000-gallon UST to store fuel oil and two 2,000-gallon USTs to store diesel fuel at the facility in the mid-1970s. In 1985, the facility hired a contractor to remove and dispose of the two diesel fuel USTs from the Former Diesel Fuel USTs Area (AOC 2). In 1986, the facility hired another contractor to clean and fill the fuel oil UST at the Fuel Oil UST Area (AOC 1) (See Section 4.0, Area of Concern, for details regarding the 1985 and 1986 UST activities). No releases from any facility USTs have been documented. There was no information available during the VSI, nor in EPA, IEPA, or facility files at the time of the PA/VSI concerning whether EPA, IEPA, or another state agency ever approved of the UST activities at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the BMC facility.

2.6.1 Climate

The facility is located approximately 4 miles southeast of O'Hare International Airport, the nearest National Weather Service station. The climate in this area is continental with cold winters and warm summers. Lake Michigan, located approximately 12 miles east of the facility, has a moderating influence on temperature extremes. The average annual daily temperature is 49.2° fahrenheit (F). The highest average daily temperature is 73.0° F in July, and the lowest average daily temperature is 21.4° F in January (NOAA, 1990).

Mean annual precipitation is 33.34 inches (NOAA, 1990). Mean annual lake evaporation is approximately 30 inches and net annual precipitation is approximately 3 inches. The 1-year 24-hour maximum rainfall is approximately 2.4 inches (NOAA, 1979).

The prevailing wind is from the west-southwest. Average wind speed is highest in April at an average of 12 miles per hour from the west-southwest (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The facility is located in an area of minimal flooding, outside the 100-year or 500-year flood plain of any surface water body (FEMA, 1981). Surface water runoff at the facility is directed to numerous storm drains located throughout the facility. Each storm drain is equipped with an alarm that automatically closes a valve in the drain and notifies the Melrose Park Fire Department (MPFD) if the alarm detects volatile organic compounds (VOC). The storm drains discharge to Silver Creek, the nearest surface water body, which is located approximately 0.25 miles northeast of the facility (Dynamac, 1992e). Silver Creek is not used for other industrial purposes, or for recreational or drinking water purposes (Dynamac, 1992c and 1992e). Silver Creek discharges to the Des Plaines River approximately 2 miles southeast of the facility (USGS, 1963). The Des Plaines River is used for recreational fishing and receives treated industrial discharge via NPDES permits, as well as non-treated storm water discharge. The Des Plaines River is not used for swimming or drinking water purposes (Dynamac, 1992a). The other surface water bodies within 2 miles of the facility include Addison Creek and 3 man-made, excavated ponds. Addison Creek is located approximately 1.25 miles southwest of the facility and is not used for recreational, industrial, or drinking water purposes (Dynamac, 1992c). Each of the ponds is less than 2 acres in size; one of the ponds is located about 1 mile southwest of the facility, one is located about 1.25 miles east of the facility, and the other is located about 1.5 miles east of the facility (USGS, 1963).

The nearest sensitive environments are the Des Plaines River and Addison Creek. There are also 4 temporarily flooded, approximately 20-acre, forested ponds located about 2 miles northeast of the facility, along the Des Plaines River (USDI, undated).

2.6.3 Geology and Soils

There has been no Soil Conservation Service soil mapping in the vicinity of Melrose Park, and no information on facility-specific soil or geology was available during the PA/VSI. According to regional geological sources, the BMC facility is located near the western edge of the former Lake Chicago Lacustrine plain. The Glenwood stage of Lake Chicago stood at an elevation of 640 feet above sea level between 13,000 and 14,000 years ago, and deposited a very thin layer of sandy near-shore sediments on top of the existing glacial drift. The underlying drift is mapped as the Wadsworth till member, deposited during the latest Wisconsinian-age glaciation. The Wadsworth till is a gray clayey or silty clayey till (Lineback, 1970). The total thickness of the glacial drift deposits is approximately 90 feet (Hughes, Kraatz, and Landon, 1966).

The uppermost bedrock unit underlying the Melrose Park area is the Silurian-age Racine dolomite. The Racine dolomite consists of pure dolomite reefs surrounded by a silty and argillaceous, cherty, light gray dolomite containing occasional lenses of green shale. The Racine dolomite is underlain by a series of four other Silurian dolomite formations. The total thickness of the Silurian dolomites in this area is approximately 250 feet. The Ordovician-age Maquoketa Shale underlies the Silurian dolomites, and is approximately 200 feet thick. The Maquoketa Shale is underlain by several thousand feet of Ordovician-age

and Cambrian-age dolomites and sandstones (Willman, 1971).

2.6.4 Ground Water

No facility-specific ground water information was available at the time of the PA/VSI. Dynamac could not locate any information concerning possible drift aquifers underlying the Wadsworth till. The Silurian dolomites comprise a shallow bedrock aquifer which was widely used for industrial and residential ground water supply in the past. A deep bedrock aquifer is comprised of the dolomites and sandstones underlying the Maquoketa Shale. The Maquoketa Shale serves as a confining layer above the deep bedrock aquifer (Hughes, Kraatz, and Landon, 1966). Depth to ground water, ground water flow direction, and hydraulic conductivities in the area are all unknown. Due to the elevation and proximity of Silver Creek, it is likely the depth to ground water is less than 10 feet and the direction of ground water flow is north toward Silver Creek (USGS, 1963).

Ground water in the area of the facility is not used as a drinking water source for the village of Melrose Park. The village of Melrose Park obtains its drinking water supply from surface water intakes located on Lake Michigan, which is located approximately 12 miles east of the facility. According to Rocco Campanelli, Supervisor, Melrose Park Department of Public Works, there are no active drinking water or industrial ground water wells located within the village limits (Dynamac, 1992c).

2.7 RECEPTORS

The BMC facility occupies a total of about 14 acres of land in a mixed industrial/commercial area in Melrose Park, Illinois, which had a 1990 population of about 20,859 persons (State of Illinois, 1991).

The facility is bordered on the north by a park owned by the Melrose Park Park District, a gravel company, and an Alberto Products facility; on the south by North Avenue; on the west by the Indian Harbor Belt Line rail line; and on the east by a TCI facility. The nearest residences are located approximately 0.1 miles southeast of the facility. The nearest school, Stevenson School, is located approximately 0.5 miles southeast of the facility. There are 10 other schools located within 2 miles of the facility (USGS, 1963). Access to the facility is controlled by a 6-foot-high chain-link fence and an electronic security system.

Surface water runoff from the facility is collected by numerous storm drains located throughout the facility. Each storm drain is equipped with an alarm that automatically closes a valve in the drain and notifies the MPFD if the alarm detects VOCs. The storm drains discharge to Silver Creek, the nearest surface water body, which is located approximately 0.25 miles northeast of the facility (Dynamac, 1992e). Silver Creek is not used for other industrial purposes, or for recreational or drinking water purposes (Dynamac, 1992c and 1992e). and discharges to the Des Plaines River approximately 2 miles southeast of the facility (USGS, 1963). The Des Plaines River is used for recreational fishing and receives treated industrial discharge via NPDES permits, as well as non-treated storm water

discharge. The Des Plaines River is not used for swimming or drinking water purposes (Dynamac, 1992a). The other surface water bodies within 2 miles of the facility include Addison Creek and 3 man-made excavated ponds. Addison Creek is located approximately 1.25 miles southwest of the facility and is not used for recreational, industrial, or drinking water purposes (Dynamac, 1992c). Each of the ponds is less than 2 acres in size; one of the ponds is located about 1 mile southwest of the facility, one is located about 1.25 miles east of the facility, and the other is located about 1.5 miles east of the facility (USGS, 1963).

Ground water in the area of the facility is not used as a drinking water source for the village of Melrose Park. The City of Melrose Park obtains its drinking water supply from surface water intakes on Lake Michigan. According to Rocco Campanelli, Supervisor, Melrose Park Department of Public Works, there are no active drinking water or industrial ground water wells located within the village limits (Dynamac, 1992c).

The nearest sensitive environments are the Des Plaines River and Addison Creek. There are also four approximately 20-acre, temporarily flooded, forested ponds located about 2 miles northeast of the facility, along the Des Plaines River (USDI, undated).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the seven SWMUs identified during the PA/VSI. The following information is presented for each SWMU; description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac's observations. Figure 2 shows the SWMU locations.

SWMU 1

Dilute Caustic Sludge AST

Unit Description:

The Dilute Caustic Sludge AST is located near the northeast corner of the paint manufacturing plant at the facility. The unit consists of a 7,500-gallon steel AST used to manage hazardous waste for less than 90 days. The unit is situated on a concrete pad surrounded by a 2-foot steel berm. There is a storm drain located in the concrete pad; however the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects VOCs.

Date of Startup:

This unit began operation in 1984.

Date of Closure:

This unit is currently active.

Wastes Managed:

This unit manages dilute caustic sludge (D030, D033) prior to shipping it off site for treatment and landfilling.

Release Controls:

This unit stores waste in a closed steel AST on a concrete pad surrounded by a 2-foot steel berm.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

Dynamac observed this unit located near the northeast corner of the paint manufacturing plant at the facility (See Photo No. 1). The unit appeared to be in sound condition. There were no visible cracks or evidence of release in the concrete pad or the surrounding berm.

SWMU 2

Dilute Caustic Sludge Bin

Unit Description:

The Dilute Caustic Sludge Bin consists of a 2,700-gallon steel bin with a steel lid located outdoors on an asphalt surface near the resin manufacturing plant. The unit manages hazardous waste. There is a storm drain located northwest of the unit; however the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects VOCs.

Date of Startup: This unit began operation at this location in about 1984.

Date of Closure: This unit is active.

Wastes managed: This unit manages dilute caustic sludge (D030, D033) prior to being shipped off site for treatment and landfilling.

Release Controls: This unit is located on an asphalt surface and manages waste in a steel bin with a steel lid.

History of Documented Releases: No releases from this unit have been documented.

Observations: Dynamac observed the unit located outdoors, just west of the resin manufacturing plant at the facility (See Photo No. 2). The unit appeared to be in sound condition. The steel lid was slightly ajar at one end to accommodate for a hose entering the bin. Dynamac did not observe any odors in the general vicinity of the unit. There were no visible stains or evidence of a release in the area of the unit.

SWMU 3

Drummed Waste Storage Area

Unit Description: The Drummed Waste Storage Area consists of a 180-square-foot area located outdoors on an asphalt surface near the northwest corner of the facility. The unit manages hazardous and nonhazardous waste in 55-gallon steel drums on wood pallets. Hazardous wastes are managed on the north side of the unit, which is marked with bright yellow paint. Nonhazardous wastes are managed on the south side of the unit (See Photo No. 3). There are no drains located in the area of this unit.

Date of Startup: This unit began operation in 1989.

Date of Closure: This unit is active.

Wastes managed: This unit manages off-specification paint (D001), off-specification resin (D001), off-specification fire-retardant paint (D019, D032), waste styrene (waste code(s) to be determined following analysis of this waste), contaminated soil (U239), and nonhazardous off-specification paint. The facility ships the off-specification paint and resin off site for fuel blending; the contaminated soil off site for incineration; and the

nonhazardous off-specification paint waste off site for landfilling. The facility will determine the method of disposal for the waste styrene after the appropriate waste code(s) have been assigned to this waste. There was no information available during the VSI interview, nor in EPA, IEPA, or facility files at the time of the PA/VSI concerning the ultimate disposition of the off-specification fire-retardant paint.

Release Controls: This unit manages waste in closed 55-gallon steel drums situated on wood pallets on an asphalt surface with no drains.

History of Documented Releases: No releases from this unit have been documented.

Observations: Dynamac observed 14 drums containing hazardous waste and 9 drums of nonhazardous off-specification paint in this unit (See Photo No. 3). All drums were stored closed and were marked with respective hazardous/nonhazardous waste labels. There were no visible stains or evidence of a release in the area of this unit.

SWMU 4 Baghouse Collection Drums

Unit Description: The Baghouse Collection Drums consist of three 55-gallon steel drums located indoors on a concrete floor inside the paint manufacturing plant. The units are used to collect nonhazardous baghouse dust via an enclosed dust collection system. There were no floor drains in the area of this unit.

Date of Startup: This unit began operation in about 1952.

Date of Closure: This unit is active.

Wastes managed: This unit collects nonhazardous baghouse dust. The facility empties this waste into a municipal garbage dumpster with other municipal garbage prior to shipping it off site for landfilling.

Release Controls: This unit manages nonhazardous waste in 55-gallon steel drums that are connected to an enclosed dust collection system. The drums are located on a concrete floor with no drains.

History of Documented Releases: No releases from this unit have been documented.

Observations: Dynamac observed three 55-gallon drums in the paint manufacturing plant at the facility (See Photo No. 4). The drums appeared to be in sound condition. There were no visible stains or evidence of a release in the area of this unit.

SWMU 5

Former Drummed Waste Storage Area

Unit Description: The Former Drummed Waste Storage Area consisted of a 1,500-square-foot area located outdoors on an asphalt surface. The unit was located in the area which currently contains the raw material warehouse at the facility. There is a storm drain located just southeast of the area where this unit was formerly located; however the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects any VOCs.

Date of Startup: This unit began operation in the early 1970s.

Date of Closure: The facility conducted IEPA-approved RCRA closure of this unit in 1985. The unit continued to manage waste for less than 90 days until it became inactive in 1989.

Wastes managed: This unit managed off-specification paint (D001), off-specification resin (D001), and nonhazardous off-specification paint. The facility shipped these wastes off site for fuel blending.

Release Controls: This unit managed waste in closed 55-gallon steel drums located on an asphalt surface. There was a storm drain located just southeast of this unit; however the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects any VOCs.

History of Documented Releases: No releases from this unit have been documented.

Observations: Dynamac observed the raw material warehouse that is located in the area where this unit was formerly located. The concrete floor of the warehouse completely covers the former unit. For this reason, Dynamac was unable to observe or photograph the unit.

SWMU 6**Former Dilute Caustic Sludge AST Location****Unit Description:**

The Former Dilute Caustic Sludge AST Location is located at the tank farm at the facility on a concrete pad surrounded by a 2-foot concrete berm. This unit formerly contained the Dilute Caustic Sludge AST (SWMU 1); the unit was identified on the facility's 1980 Part A and was used to manage hazardous waste. There is a storm drain located in the concrete pad; however the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects any VOCs. In 1984, the facility moved the AST to its current location near the northeast corner of the paint manufacturing plant to reduce the amount of area needed to transport the hazardous waste from the generation point to the unit.

Date of Startup:

This unit began operation in the mid-1970s.

Date of Closure:

This unit has been inactive since 1984. Although the facility identified this unit on its Part A, there was no documentation available during the VSI, nor in EPA, IEPA, or facility files at the time of the PA/VSI regarding whether the facility ever conducted RCRA closure of this unit.

Wastes Managed:

This unit stored dilute caustic sludge (D030, D033) for greater than 90 days. The facility shipped this waste off site for treatment and landfilling.

Release Controls:

This unit managed waste in a closed steel AST located on a concrete pad surrounded by a 2-foot concrete berm. There is a storm drain located in the concrete pad; however the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects any VOCs.

History of**Documented Releases:**

No releases from this unit have been documented.

Observations:

Dynamac observed the concrete pad where the Dilute Caustic Sludge AST (SWMU 1) was formerly located (See Photo No. 6). The concrete pad appeared to be in sound condition. There were no visible stains or evidence of release in the area of the unit.

SWMU 7**Former Dilute Caustic Sludge Bin****Unit Description:**

The Former Dilute Caustic Sludge Bin was located on an asphalt surface just east of what is currently the raw material warehouse at the facility. This unit consisted of an approximately 320-cubic-foot open steel bin and was used to manage hazardous waste. There is a storm drain located south of the former location of this unit; however, during the time the unit was in operation, the storm drain was equipped with an alarm that would shut off the valve to the drain and notify the MPFD if the alarm detected any VOCs.

Date of Startup:

This unit began operation at an unknown date prior to 1970.

Date of Closure:

This unit became inactive in about 1976 and no longer exists at the facility.

Wastes Managed:

This unit managed dilute caustic sludge (D030, D033). The facility shipped this waste off site for treatment and landfilling.

Release Controls:

This unit managed waste outdoors in an open steel bin located on an asphalt surface. There is a storm drain located south of this unit; however, during the time the unit was in operation, the storm drain was equipped with an alarm that would shut off the valve to the drain and notify the MPFD if the alarm detected any VOCs.

History of**Documented Releases:**

No releases from this unit have been documented.

Observations:

Dynamac observed the asphalt surface where this unit was formerly located (See Photo No. 7). The steel bin is no longer present at the facility. The asphalt surface appeared to be in sound condition. There were no visible stains or evidence of a release in the area.

4.0 AREAS OF CONCERN

Dynamac identified five AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

AOC 1 Fuel Oil UST Area

The Fuel Oil UST Area is located immediately south of the tank farm in the west half of the facility (See Figure 2). This area contains a 20,000-gallon steel UST formerly used to store fuel oil. The facility installed the UST in the mid-1970s. In April 1986, the facility hired a contractor to clean the UST, fill the UST with concrete, and replaced the covers (Hartmann, 1986). Dynamac did not photograph this AOC because the area has very recently been paved, thus covering up any potential visible stains or evidence of a release. No releases from the UST have been documented. This area is considered an AOC because there was no documentation available during the VSI, nor in EPA, IEPA, or facility files indicating whether the facility conducted a leak test or collected soil samples in the area surrounding the UST to verify whether contamination impacted the surrounding soil.

AOC 2 Former Diesel Fuel USTs Area

The Diesel Fuel USTs Area is located immediately north of the resin manufacturing plant, where the raw material warehouse is currently located (See Figure 2). This area formerly contained two 2,000-gallon steel USTs used to store diesel fuel. The facility installed these USTs during the mid-1970s. In March 1985, the facility hired a contractor to remove and dispose of any remaining fuel in the tanks, and to excavate, remove, and dispose of the tanks. The contractor backfilled the excavation using the excavated material (ATPCI, 1985). The concrete floor of the warehouse completely covers this AOC; for this reason, Dynamac was unable to observe or photograph the soil in the area of the AOC. No releases from these USTs have been documented. This area is considered an AOC because there was no documentation available during the VSI, nor in EPA, IEPA, or facility files indicating whether the facility conducted a leak test or collected soil samples in the area surrounding the USTs to verify whether contamination impacted the surrounding soil.

AOC 3

Alleged Drum Burial Area No. 1

In a March 1991 letter to EPA, an employee of TCI alleged BMC and/or TCI buried drums of solvent-based black enamel at AOC 1 between 15 and 16 years ago (See Figure 2) (DAKH, 1991). This information was identified only after the VSI, therefore no photograph of this area is available. During a telephone conversation with Dynamac subsequent to the VSI, Henry Placke of BMC stated he was unaware of the allegations or of any waste ever being buried at the facility. Thad Slaughter of EPA reviewed the EPA file information for both BMC and TCI. However, due to the time frame in which the alleged activities took place (pre-RCRA), his division could not recommend any further investigation. Mr. Slaughter stated he delivered the letter and the file information to the Superfund Division. The Superfund Division determined it could not warrant any further investigation of BMC and TCI under its jurisdiction due to a lack of environmental receptors that might be affected by a release from the alleged buried drums (Dynamac, 1992b). This area is considered an AOC because there has been no further investigation and/or documentation of whether or not the allegations described above are factual (See Section 2.4, History of Documented Releases, for further information concerning the allegations).

AOC 4

Alleged Drum Burial Area No. 2

In a March 1991 letter to EPA, an employee of TCI alleged BMC and/or TCI buried drums of hazardous waste at AOC 4 between 15 and 16 years ago (See Figure 2) (DAKH, 1991). This information was identified only after the VSI, therefore no photograph of this area is available. During a telephone conversation with Dynamac subsequent to the VSI, Henry Placke of BMC stated he was unaware of the allegations or of any waste ever being buried at the facility. Mr. Slaughter of EPA reviewed the EPA file information for both BMC and TCI. However, due to the time frame in which the alleged activities took place (pre-RCRA), his division could not recommend any further investigation. Mr. Slaughter stated he delivered the letter and the file information to the Superfund Division. The Superfund Division determined it could not warrant any further investigation of BMC and TCI under its jurisdiction due to a lack of environmental receptors that might be affected by a release from the alleged buried drums (Dynamac, 1992b). There was no information available in EPA or IEPA files at the time of the PA/VSI regarding the type of hazardous waste alleged to be buried at AOC 4. This area is considered an AOC because there has been no further investigation and/or documentation of whether or not the allegations described above are factual (See Section 2.4, History of Documented Releases, for further information concerning the allegations).

AOC 5**Alleged Drum Burial Area No. 3**

In a March 1991 letter to EPA, an employee of TCI alleged BMC and/or TCI buried drums of hazardous waste at AOC 5 between 15 and 16 years ago (See Figure 2; photo not available) (DAKH, 1991). This information was identified only after the VSI, therefore no photograph of this area is available. During a telephone conversation with Dynamac subsequent to the VSI, Mr. Placke of BMC stated he was unaware of the allegations or of any waste ever being buried at the facility. Mr. Slaughter of EPA reviewed the EPA file information for both BMC and TCI. However, due to the time frame in which the alleged activities took place (pre-RCRA), his division could not recommend any further investigation. Mr. Slaughter stated he delivered the letter and the file information to the Superfund Division. The Superfund Division determined it could not warrant any further investigation of BMC and TCI under its jurisdiction due to a lack of environmental receptors that might be affected by a release from the alleged buried drums (Dynamac, 1992b). There was no information available in EPA or IEPA files at the time of the PA/VSI regarding the type of hazardous waste alleged to be buried at AOC 5. This area is considered an AOC because there has been no further investigation and/or documentation of whether or not the allegations described above are factual (See Section 2.4, History of Documented Releases, for further information concerning the allegations).

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified seven SWMUs and five AOCs at the BMC facility. Background information on the facility's location, operations, waste generation and management, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are Dynamac's conclusions and recommendations for each SWMU and AOC. Table 3, located at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU 1 Dilute Caustic Sludge AST

Conclusions: The Dilute Caustic Sludge AST manages dilute caustic sludge (D030, D033) in a closed steel AST on a concrete pad surrounded by a 2-foot steel berm. There is a storm drain located in the concrete pad that discharges to Silver Creek; however, the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects VOCs. At the time of the VSI, the unit appeared to be in sound condition and there were no visible cracks or evidence of release in the concrete pad or the surrounding berm. No releases from this unit have been documented. The potential for a release to environmental media from this unit is summarized below.

Due to the release controls described above, there is a low potential for a release to on-site soil, ground water, surface water, or air from this unit.

Recommendations: Dynamac recommends no further action for this unit at this time.

SWMU 2 Dilute Caustic Sludge Bin

Conclusions: The Dilute Caustic Sludge Bin manages dilute caustic sludge (D030, D033) in a steel bin located on an asphalt surface. The unit has a steel lid; however, the lid is slightly ajar at one end (between 1 and 2 inches) to accommodate for a hose entering the bin. There is a storm drain located northwest of the unit that discharges to Silver Creek; however, the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects any VOCs. There were no visible stains or evidence of a release in the area of the unit. No releases from this unit have been documented. The potential for a release to environmental media from this unit is summarized below.

On-Site Soil: Low. Due to the release controls described above, there is a low potential for a release to on-site soil from this unit.

Ground Water: Low. Due to the release controls described above, there is a low potential for a release to ground water from this unit.

Surface Water: Low. Due to the release controls described above, there is a low potential for a release to ground water from this unit.

Air: High. The steel lid covering this unit is slightly ajar at one end (between 1 and 2 inches) to accommodate for a hose entering the unit. Although Dynamac did not observe any odors in the general vicinity of the unit, there is a high potential for the volatile constituents of the dilute caustic sludge (D030, D033) to impact the air.

Recommendations: Dynamac recommends the facility modify the lid of this unit so releases of volatile constituents to the air are limited.

SWMU 3 Drummed Waste Storage Area

Conclusions: The Drummed Waste Storage Area manages off-specification paint (D001), off-specification resin (D001), off-specification fire-retardant paint (D019, D032), waste styrene (waste code(s) to be determined following analysis of this waste), and nonhazardous off-specification paint in closed 55-gallon steel drums wood pallets on an asphalt surface with no drains. There were no visible stains or evidence of a release in the area of this unit. No releases from this unit have been documented. The potential for a release to environmental media from this unit is summarized below.

Due to the release controls described above, there is a low potential for a release to on-site soil, ground water, surface water, or air from this unit.

Recommendations: Dynamac recommends no further action for this unit at this time.

SWMU 4 Baghouse Collection Drums

Conclusions: The Baghouse Collection Drums collect nonhazardous baghouse dust in 55-gallon steel drums that are connected to an enclosed dust collection system. The units are located on a concrete floor with no drains. There were no visible stains or evidence of a release in the area of this unit. No releases from this unit have been documented. The potential for a release to environmental media from this unit is summarized below.

Due to the release controls described above, there is a low potential for a release to on-site soil, ground water, surface water, or air from this unit.

Recommendations: Dynamac recommends no further action for this unit at this time.

SWMU 5 Former Drummed Waste Storage Area

Conclusions: The Former Drummed Waste Storage Area managed off-specification paint (D001), off-specification resin (D001), and nonhazardous off-specification paint in closed 55-gallon steel drums located on an asphalt surface. There was a storm drain located just southeast of this unit that discharges to Silver Creek; however, the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects any VOCs. The facility conducted IEPA-approved RCRA closure of this unit in 1985; the unit became inactive in 1989, and is currently covered by the raw material warehouse. Although the facility identified this unit as a storage unit on its Part A, there was no documentation available during the VSI, nor in EPA, IEPA, or facility files concerning whether the facility ever conducted RCRA closure of this unit. No releases from this unit have been documented. The potential for a release to environmental media from this unit is summarized below.

Due to the release controls described above, there is a low potential for a release to on-site soil, ground water, surface water, or air from this unit.

Recommendations: Dynamac recommends no further action for this unit at this time.

SWMU 6 Former Dilute Caustic Sludge AST Location

Conclusions: The Former Dilute Caustic Sludge AST Location managed dilute caustic sludge (D030, D033) in a closed steel AST located on a concrete pad surrounded by a 2-foot concrete berm. There is a storm drain located in the concrete pad that discharges to Silver Creek; however, the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects any VOCs. The facility identified this unit on its 1980 Part A, but there was no documentation available during the VSI, nor in EPA or IEPA files regarding whether the facility conducted RCRA closure of this unit. The unit became inactive in 1984, when the facility moved the AST to its current location near the northeast corner of the paint manufacturing plant (Dilute Caustic Sludge AST - SWMU 1). There were no stains or evidence of release in the area of this unit and no releases from the unit have been documented. The potential for a past release to environmental media from this unit is summarized below.

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Due to the release controls described above, there is a low potential for a release to on-site soil, ground water, surface water, or air from this unit.

Recommendations: Because the facility identified this unit on its Part A, Dynamac recommends the facility either provide documentation that it has already conducted IEPA-approved RCRA closure of this unit, or conduct RCRA closure of this unit and submit certification of closure activities to IEPA for approval.

SWMU 7 Former Dilute Caustic Sludge Bin

Conclusions: The Former Dilute Caustic Sludge Bin managed dilute caustic sludge (D030, D033) outdoors in an open steel bin located on an asphalt surface. There is a storm drain located south of the former location of this unit that discharges to Silver Creek; however, the storm drain is equipped with an alarm that shuts off the valve to the drain and notifies the MPFD if the alarm detects any VOCs. This unit became inactive in about 1976 and no longer exists at the facility. There were no visible stains or evidence of a release in the area that formerly contained this unit. No releases from this unit have been documented. The potential for a historical release to environmental media from this unit is summarized below.

On-Site Soil, Ground Water, and Surface Water: Low. Due to the release controls described above, there is a low potential for a historical release to on-site soil, ground water, or surface water from this unit.

Air: High. Because this unit managed volatile waste in an open bin, there was a high potential for a historical release to air from this unit.

Recommendations: Dynamac recommends no further action for this unit at this time.

AOC 1 Fuel Oil UST Area

Conclusions: The Fuel Oil UST Area contains a 20,000-gallon steel UST formerly used to store fuel oil. The facility installed the UST in the mid-1970s. In April 1986, the facility hired a contractor to clean the UST, fill it with concrete, and replace the covers (Hartmann, 1986). No releases from the UST have been documented. The potential for a release to environmental media from this AOC is discussed below.

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On-Site Soil: Moderate. Although no releases from this AOC have been documented, there was no documentation available during the VSI, nor in EPA, IEPA, or facility files indicating whether the facility conducted a leak test or collected soil samples in the area surrounding the UST to verify that potential past releases did not impact the surrounding soil.

Ground Water: Moderate. Since there is a moderate potential for a release to on-site soil from this AOC, and because the soils in the area of the facility consist of sandy glacial drift and the depth to ground water is likely to be less than 10 feet, there is a moderate potential for a release to ground water from this AOC.

Surface Water: Moderate. Since there is a moderate potential for a release to ground water from this AOC, and because the direction of ground water flow is likely to be toward Silver Creek, which is located approximately 0.25 miles north of the facility, there is a moderate potential for a release to surface water from this AOC via the ground water.

Air: Low. Because the UST is located beneath the ground, there is a low potential for any volatile constituents of the material in the UST to have migrated to the air.

Recommendations: Dynamac recommends the facility provide documentation that it conducted a leak test of the UST prior to cleaning activities or conduct soil sampling in the area of the UST to verify that potential contaminants have not impacted surrounding soil.

AOC 2

Former Diesel Fuel USTs Area

Conclusions:

The Former Diesel Fuel USTs Area formerly contained two 2,000-gallon steel USTs used to store diesel fuel. The facility installed these USTs during the mid-1970s. In March 1985, the facility hired a contractor to remove and dispose of any remaining fuel in the tanks, and to excavate, remove, and dispose of the tanks. The contractor backfilled the excavation using the excavated material (ATPCI, 1985). No releases from these USTs have been documented. The potential for a release to environmental media from this AOC is discussed below.

On-Site Soil: Moderate. Although no releases from this AOC have been documented, there was no documentation available during the VSI, nor in EPA, IEPA, or facility files indicating whether the facility

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conducted a leak test or collected soil samples in the area surrounding the UST to verify that potential past releases did not impact the surrounding soil.

Ground Water: Moderate. Since there is a moderate potential for a release to on-site soil from this AOC, and because the soils in the area of the facility consist of sandy glacial drift and the depth to ground water is likely to be less than 10 feet, there is a moderate potential for a release to ground water from this AOC.

Surface Water: Moderate. Since there is a moderate potential for a release to ground water from this AOC, and because the direction of ground water flow is likely to be toward Silver Creek, which is located approximately 0.25 miles north of the facility, there is a moderate potential for a release to surface water from this AOC via the ground water.

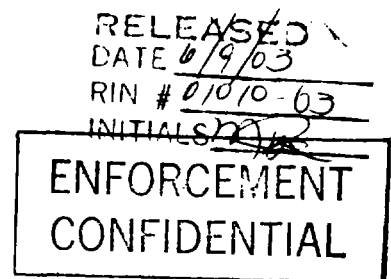
Air: Low. Because the UST is located beneath the ground, there is a low potential for any volatile constituents of the material in the UST to have migrated to the air.

Recommendations: Dynamac recommends the facility either provide documentation that it conducted a leak test of the UST prior to removal activities, or conduct soil sampling in the area of the former USTs to verify that potential contaminants have not impacted the surrounding soil.

AOC 3 Alleged Drum Burial Area No. 1

Conclusions: In a March 1991 letter to EPA, an employee of TCI alleged BMC and/or TCI buried drums of solvent-based black enamel at AOC 1 between 15 and 16 years ago. Mr. Placke of BMC stated he was unaware of the allegations or of any waste ever being buried at the facility (See Section 2.4, History of Documented Releases, for further information concerning the allegations). EPA has reviewed its files for both BMC and TCI; however, there has been no further investigation and/ or documentation of whether or not the allegations described above are factual. For this reason, the potential for a release to environmental media from this AOC is discussed below.

On-Site Soil: High. If the allegations described above are factual, there is a high potential the drums of buried hazardous waste have leaked material to the surrounding soil.



Ground Water: Moderate. Since there is a high potential for a release to on-site soil from this AOC, and because the soils in the area of the facility consist of sandy glacial drift and the depth to ground water is likely to be less than 10 feet, there is a moderate potential for a release to ground water from this AOC.

Surface Water: Moderate. Since there is a moderate potential for a release to ground water from this AOC, and because the direction of ground water flow is likely to be toward Silver Creek, which is located approximately 0.25 miles north of the facility, there is a moderate potential for a release to surface water from this AOC via the ground water.

Air: Low. Because the hazardous waste is alleged to be buried beneath the ground, there is a low potential for any volatile constituents of the material in the drums to have migrated to the air.

Recommendations: Dynamac recommends the facility provide documentation showing the allegations discussed above are false or conduct soil sampling in the area alleged to contain buried hazardous waste to verify that allegations are false.

AOC 4

Alleged Drum Burial Area No. 2

Conclusions: In a March 1991 letter to EPA, an employee of TCI alleged BMC and/or TCI buried drums of hazardous waste at AOC 4 between 15 and 16 years ago. Mr. Placke of BMC stated he was unaware of the allegations or of any waste ever being buried at the facility (See Section 2.4, History of Documented Releases, for further information concerning the allegations). EPA has reviewed its files for both BMC and TCI; however, there has been no further investigation and/or documentation of whether or not the allegations described above are factual. For this reason, the potential for a release to environmental media from this AOC is discussed below.

On-Site Soil: High. If the allegations described above are factual, there is a high potential the drums of buried hazardous waste have leaked material to the surrounding soil.

Ground Water: Moderate. Since there is a high potential for a release to on-site soil from this AOC, and because the soils in the area of the facility consist of sandy glacial drift and the depth to ground water is likely to be less than 10 feet, there is a moderate potential for a release to ground water from this AOC.

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Surface Water: Moderate. Since there is a moderate potential for a release to ground water from this AOC, and because the direction of ground water flow is likely to be toward Silver Creek, which is located approximately 0.25 miles north of the facility, there is a moderate potential for a release to surface water from this AOC via the ground water.

Air: Low. Because the hazardous waste is alleged to be buried beneath the ground, there is a low potential for any volatile constituents of the material in the drums to have migrated to the air.

Recommendations: Dynamac recommends the facility provide documentation showing the allegations discussed above are false or conduct soil sampling in the area alleged to contain buried hazardous waste to verify that allegations are false.

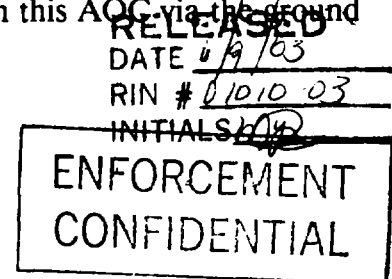
AOC 5 Alleged Drum Burial Area No. 3

Conclusions: In a March 1991 letter to EPA, an employee of TCI alleged BMC and/or TCI buried drums of hazardous waste at AOC 5 between 15 and 16 years ago. Mr. Placke of BMC stated he was unaware of the allegations or of any waste ever being buried at the facility (See Section 2.4, History of Documented Releases, for further information concerning the allegations). EPA has reviewed its files for both BMC and TCI; however, there has been no further investigation and/or documentation of whether or not the allegations described above are factual. For this reason, the potential for a release to environmental media from this AOC is discussed below.

On-Site Soil: High. If the allegations described above are factual, there is a high potential the drums of buried hazardous waste have leaked material to the surrounding soil.

Ground Water: Moderate. Since there is a high potential for a release to on-site soil from this AOC, and because the soils in the area of the facility consist of sandy glacial drift and the depth to ground water is likely to be less than 10 feet, there is a moderate potential for a release to ground water from this AOC.

Surface Water: Moderate. Since there is a moderate potential for a release to ground water from this AOC, and because the direction of ground water flow is likely to be toward Silver Creek, which is located approximately 0.25 miles north of the facility, there is a moderate potential for a release to surface water from this AOC via the ground water.



Air: Low. Because the hazardous waste is alleged to be buried beneath the ground, there is a low potential for any volatile constituents of the material in the drums to have migrated to the air.

Recommendations: Dynamac recommends the facility provide documentation showing the allegations discussed above are false or conduct soil sampling in the area alleged to contain buried hazardous waste to verify that allegations are false.

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TABLE 3
SWMU AND AOC SUMMARY

<u>Solid Waste Management Unit</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Dilute Caustic Sludge AST	1984 to the present	None	None
2. Dilute Caustic Sludge Bin	1984 to the present	Steel lid was open at one end during VSI	Modify lid to keep VOCs from impacting air
3. Drummed Waste Storage Area	1989 to the present	None	None
4. Baghouse Collection Drums	1952 to the present	None	None
5. Former Drummed Waste Storage Area	Early 1970s to 1989	None	None
6. Former Dilute Caustic Sludge AST Location	Mid-1970s to 1984	None	Provide documentation of IEPA-approved closure activities or conduct closure
7. Former Dilute Caustic Sludge Bin	Pre-1970s to 1976	None ^a	None

^a The Former Dilute Caustic Sludge Bin managed volatile waste in an open bin. There is a high potential for a historical release to the air from this unit. However, the unit became inactive in 1976 and no longer exists at the facility. For this reason, there is a low potential for a release to air from this unit at this time.

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TABLE 3 (continued)
SWMU AND AOC SUMMARY

<u>Area of Concern</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Fuel Oil UST Area	Mid-1970s to 1986	None	Provide documentation of a leak test prior to cleaning activities or conduct soil sampling to verify whether contamination impacted soil
2. Former Diesel Fuel USTs Area	Mid-1970s to 1985	None	Provide documentation of a leak test prior to removal activities or conduct soil sampling to verify whether contamination impacted soil
3. Alleged Drum Burial Area No. 1	Between 15 and 16 years ago (approximately 1975 or 1976)	None	Provide documentation that the allegations are false or conduct soil sampling to verify the allegations are false
4. Alleged Drum Burial Area No. 2	Between 15 and 16 years ago (approximately 1975 or 1976)	None	Provide documentation that the allegations are false or conduct soil sampling to verify the allegations are false
5. Alleged Drum Burial Area No. 3	Between 15 and 16 years ago (approximately 1975 or 1976)	None	Provide documentation that the allegations are false or conduct soil sampling to verify the allegations are false

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RIN # D1012-03
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REFERENCES

- Aetna Tank and Pump Company, Inc. (ATPCI), 1985. Proposal to remove two 2,000-gallon diesel fuel underground storage tanks at the BMC facility, March 25.
- Benjamin Moore and Company (BMC), 1980a. Notification of Hazardous Waste Activity (Notification), August 11.
- BMC, 1980b. Part A permit application (Part A), November 10.
- BMC, 1982a. Letter from BMC to Bharat Mathur, Illinois Environmental Protection Agency (IEPA), requesting withdrawal of facility asbestos permit No. A7207002, April 5.
- BMC, 1982b. Blueprint of facility layout received during the September 9, 1992, VSI, September 22.
- BMC, 1983. Letter from A.F. Neumann, BMC, to Larry Eastep, IEPA, requesting withdrawal of the facility's Part A, July 29.
- BMC, 1988. Letter from Henry Placke, BMC, to Alex Apuzzo, Melrose Park Environmental Department, regarding an October 6, 1988 xylene spill at the facility, October 28.
- Douglas, Alexa, Koeppen, and Hurley (DAKH), 1991. Letter from Diane Hyatte of DAKH, to Thad Slaughter, RCRA Enforcement Branch, U. S. Environmental Protection Agency, regarding allegations of buried hazardous waste at the BMC facility, March 6.
- Dynamac Corporation (Dynamac), 1992a. Telephone conversation between Deborah Hall, Dynamac, and Ahmad Abulaban, IEPA, regarding surface water use of the Des Plaines River, July 15.
- Dynamac, 1992b. Telephone conversation between Deborah Hall, Dynamac, and Thad Slaughter, U.S. Environmental Protection Agency, regarding allegations of hazardous waste buried at the BMC facility, October 13.
- Dynamac, 1992c. Telephone conversation between Deborah Hall, Dynamac, and Rocco Campanelli, Melrose Park Water Department, regarding ground water use in the village of Melrose Park, and surface water use of Silver and Addison Creeks, October 27.
- Dynamac, 1992d. Telephone conversation between Deborah Hall, Dynamac, and Scott Owens, Emergency Response Unit, IEPA, regarding Incident No. 881322 at the BMC facility, November 19.

REFERENCES (continued)

- Dynamac, 1992e. Telephone conversation between Deborah Hall, Dynamac, and a supervisor at the Melrose Park Water Department, regarding the storm drain collection system in the Village of Melrose Park, November 20.
- Federal Emergency Management Agency (FEMA), 1981. Flood Insurance Rate Map of Cook County, Illinois (unincorporated areas), panel 115 of 245, April 15.
- Hartmann Company, J., 1986. Invoice for work conducted on a 20,000-gallon fuel oil underground storage tank at the BMC facility, April 30.
- Hughes, G., P. Kraatz, and R. Landon, 1966. "Bedrock Aquifers of Northeastern Illinois," Illinois State Geological Survey, Circular No. 406.
- IEPA, 1982. Letter from Kenneth Bechley, IEPA, to Michael Bonner, BMC, regarding violations cited during an April 27, 1982, RCRA compliance inspection, June 10.
- IEPA, 1985. Letter from Larry Eastep, IEPA, to John E. Lynch, BMC, regarding facility compliance during an August 7, 1985, closure inspection at the facility, October 23.
- IEPA, 1989. Operating Air Permit for all air emission sources at the BMC facility issued by IEPA, December 19.
- Lineback, J.A., 1970. Quaternary Deposits in Illinois, Map, 1:500,000 scale.
- National Oceanic and Atmospheric Administration (NOAA), 1979. Climatic Atlas of the U.S., Asheville, North Carolina.
- NOAA, 1990. Local Climatological Data for O'Hare International Airport, Illinois.
- State of Illinois, 1991. Official Highway Map of Illinois.
- U.S. Department of the Interior (USDI), undated. National Wetlands Inventory Map, 1:24,000 scale, Elmhurst and River Forest, Illinois, Quadrangles, based on 1981 aerial photography.
- U.S. Environmental Protection Agency (EPA), 1985. Internal Conversation Record between Mary Villaried and Barry Jenkin regarding RCRA closure and generator status of BMC facility, December 10.
- U.S. Geological Survey (USGS), 1963. 7.5 Minute Series Topographic Maps, Elmhurst and River Forest, Illinois, Quadrangles, 1:24,000, photorevised in 1972 and 1980, and in 1972, respectively.
- Willman, 1971. "Summary of the Geology of the Chicago Area," Illinois State Geological Survey, Circular No. 460.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

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EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILO 005 457 155
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II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Benjamin Moore and Company		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER Northwest intersection of North and 25th Avenues			
03 CITY Melrose Park	04 STATE IL	05 ZIP CODE 60160	06 COUNTY Cook	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 41° 54' 34" N		LONGITUDE 87° 51' 36" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) North Avenue east from Interstate 290 to 25th Avenue. The facility is at the northwest corner of the intersection.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Benjamin Moore and Company		02 STREET (Business, mailing, residential) (same as above)			
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER (708) 466-7705		
07 OPERATOR (if known and different from owner) (same as owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: MONTH DAY YEAR 08 / 11 / 80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 09 / 09 / 92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: (Specify) CONTRACTOR NAME(S): Dynamac Corporation			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1952 / Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Raw materials at the facility include "Triton 405", and various acrylics, solvents, oils, and powdered pigments. Wastes include dilute caustic sludge (D030; D033) and off-specification paints or resins (D001).					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION The lid of a steel bin containing dilute caustic sludge was slightly ajar during the inspection. In 1991, there were allegations that the facility had buried hazardous waste (unspecified) on site. There is also a potential fuel oil and/or diesel fuel leaked from one of three underground storage tanks (UST) (one cleaned and filled, the others removed) at the facility.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input checked="" type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 866-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Deborah Hall	05 AGENCY	06 ORGANIZATION Dynamac Corporation	07 TELEPHONE NUMBER (312) 466-0222	08 DATE 09 / 03 / 92 MONTH DAY YEAR



I. IDENTIFICATION

01 STATE
IL

02 SITE NUMBER
ILD 005 457 155

01 PHYSICAL STATES (Check all that apply)

- ☐ A. SOLID
☐ B. POWDER, FINES
☒ C. SLUDGE
☐ D. OTHER
- ☐ E. SLURRY
☒ F. LIQUID
☐ G. GAS

(Specify)

02 WASTE QUANTITY AT SITE

(Measures of waste quantities must be independent)

TON unknown

CUBIC YARDS _____

NO. OF DRUMS 23

03 WASTE CHARACTERISTICS (Check all that apply)

- ☐ A. TOXIC
☐ B. CORROSIVE
☐ C. RADIOACTIVE
☐ D. PERSISTENT
☐ E. SOLUBLE
☐ F. INFECTIOUS
☐ G. FLAMMABLE
☐ H. IGNITABLE
☐ I. HIGHLY VOLATILE
☐ J. EXPLOSIVE
☐ K. REACTIVE
☐ L. INCOMPATIBLE
☐ M. NOT APPLICABLE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	- 5,500	gallons	estimated gross amount; full capacity is 10,200 gallons
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	770	gallons	off-spec. paint, resin, or styrene
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

[illegible]

CATEGORY NUMBER	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

Information obtained during the VSI, and from EPA and IEPA file reviews.



EPA

**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS**

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILO 005 457 155
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II. HAZARDOUS CONDITIONS AND INCIDENTS01 ☒ A. GROUNDWATER CONTAMINATION02 ☐ OBSERVED (DATE: _____)☒ POTENTIAL☐ ALLEGED03 POPULATION POTENTIALLY AFFECTED: 0 population

04 NARRATIVE DESCRIPTION

Potential soil contamination from USTs formerly used to store fuel oil and diesel fuel may have migrated to area ground water.

01 ☒ B. SURFACE WATER CONTAMINATION02 ☐ OBSERVED (DATE: _____)☒ POTENTIAL☐ ALLEGED03 POPULATION POTENTIALLY AFFECTED: 0 population

04 NARRATIVE DESCRIPTION

Potential ground water contamination described above may have migrated to Silver Creek, which is located approximately 0.25 miles north of the facility.

01 ☒ C. CONTAMINATION OF AIR02 ☐ OBSERVED (DATE: _____)☒ POTENTIAL☐ ALLEGED03 POPULATION POTENTIALLY AFFECTED: 85 workers

04 NARRATIVE DESCRIPTION

The lid of a steel bin containing dilute caustic sludge (D030, D033) was slightly ajar, potentially allowing volatile constituents of the sludge to impact the air.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None observed.

01 ☐ E. DIRECT CONTACT02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None observed.

01 ☒ F. CONTAMINATION OF SOIL02 ☐ OBSERVED (DATE: _____)☒ POTENTIAL☐ ALLEGED03 AREA POTENTIALLY AFFECTED: 14
(Acres)

04 NARRATIVE DESCRIPTION

There is a potential that fuel oil or diesel fuel formerly stored in USTs in two different areas at the facility may have leaked material to the surrounding soil. In 1991, there were allegations the facility buried drums of hazardous waste (unspecified) on site in three different areas.

01 ☐ G. DRINKING WATER CONTAMINATION02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None documented.

01 ☐ H. WORKER EXPOSURE/INJURY02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None documented.

01 ☐ I. POPULATION EXPOSURE/INJURY02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None documented.



EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE
IL02 SITE NUMBER
ILD 005 457 155

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

04 NARRATIVE DESCRIPTION

None documented.

01 ☐ K. DAMAGE TO FAUNA02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None documented.

01 ☐ L. CONTAMINATION OF FOOD CHAIN02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

04 NARRATIVE DESCRIPTION

None documented.

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES02 ☒ OBSERVED (DATE: 09 / 08 / 92)☐ POTENTIAL☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 85 workers

04 NARRATIVE DESCRIPTION

The lid of a steel bin containing dilute caustic sludge (D030, D033) was slightly ajar, potentially allowing volatile constituents of the sludge to impact the air. Workers in the area of the bin could be exposed to the volatilized contaminants from the dilute caustic sludge.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

04 NARRATIVE DESCRIPTION

None documented.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS☐ OBSERVED (DATE: _____)☐ POTENTIAL☐ ALLEGED

04 NARRATIVE DESCRIPTION

None documented. All drains at the facility are equipped with an alarm that shuts off the valve to the drain and notifies the Melrose Park Fire Department if it detects volatile organic compounds.

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING02 ☐ OBSERVED (DATE: _____)☐ POTENTIAL☒ ALLEGED

04 NARRATIVE DESCRIPTION

In 1991, there were allegations the facility buried drums containing hazardous waste (unspecified) on site. Facility representatives were unaware of the allegations and did not know of any waste ever being buried at the facility.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None documented.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 85 workers

IV. COMMENTS

None.

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

Information obtained during the VSI, and from EPA and IEPA file reviews.

ATTACHMENT B

**VISUAL SITE INSPECTION
SUMMARY AND
PHOTOGRAPHS**

VISUAL SITE INSPECTION SUMMARY

**Benjamin Moore and Company Facility
Corner of North and 25th Avenues
Melrose Park, Illinois 60651
ILD 005 457 155**

Date: September 9, 1992

Primary Facility Representative: Henry Placke, Plant Operations Manager, Benjamin Moore and Company (BMC)
(708) 468-7705

Additional Facility Representatives: Donald Everett, Jr., Central Division Vice President
Gene Orchowski, Central Division Operations Manager
Tom Thomas, Plant Superintendent

Inspection Team: Deborah Hall, Dynamac Corporation
Joseph Weslock, Dynamac Corporation

Photographer: Joseph Weslock, Dynamac Corporation

Weather Conditions: Rainy; about 65° F

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour of the facility began at 11:00 a.m. The inspection team walked to the west side of the resin manufacturing plant where Dynamac observed the Dilute Caustic Sludge Bin (SWMU 2). The inspection team continued to the tank farm in the west portion of the facility to the Former Dilute Caustic Sludge Aboveground Storage Tank (AST) Location (SWMU 6). Dynamac also observed the Fuel Oil Underground

Visual Site Inspection Summary
BMC Facility
September 9, 1992

Storage Tank (UST) Area (AOC 1) at this location. Next, facility representatives led the inspection team to the Drummed Waste Storage Area (SWMU 3). The inspection team then walked to east side of the raw material warehouse where Dynamac observed the area that contained the Former Dilute Caustic Sludge Bin (SWMU 7) from prior to 1970 until 1976. The inspection team also observed the location of the Former Drummed Waste Storage Area (SWMU 5) and the Former Diesel Fuel USTs Area (AOC 2) in this area; however, these areas are now covered by the raw material warehouse. The inspection team then walked to the southeast corner of the paint manufacturing plant where Dynamac observed the Dilute Caustic Sludge AST (SWMU 1). The tour of the facility continued inside the paint manufacturing plant, where Dynamac observed the Baghouse Collection Drums (SWMU 4).

Dynamac notes the inspection team did not observe the Alleged Drum Burial Area Nos. 1, 2, and 3 (AOCs 3, 4, and 5, respectively), because information indentifying the potential existence of these areas was identified subsequent to the VSI.

The tour of the facility concluded at approximately 11:40 a.m., after which the inspection team held an exit interview with the facility representatives. The inspection team left the facility at 12:30 p.m.

PHOTOGRAPHS
BENJAMIN MOORE AND COMPANY FACILITY
MELROSE PARK, ILLINOIS

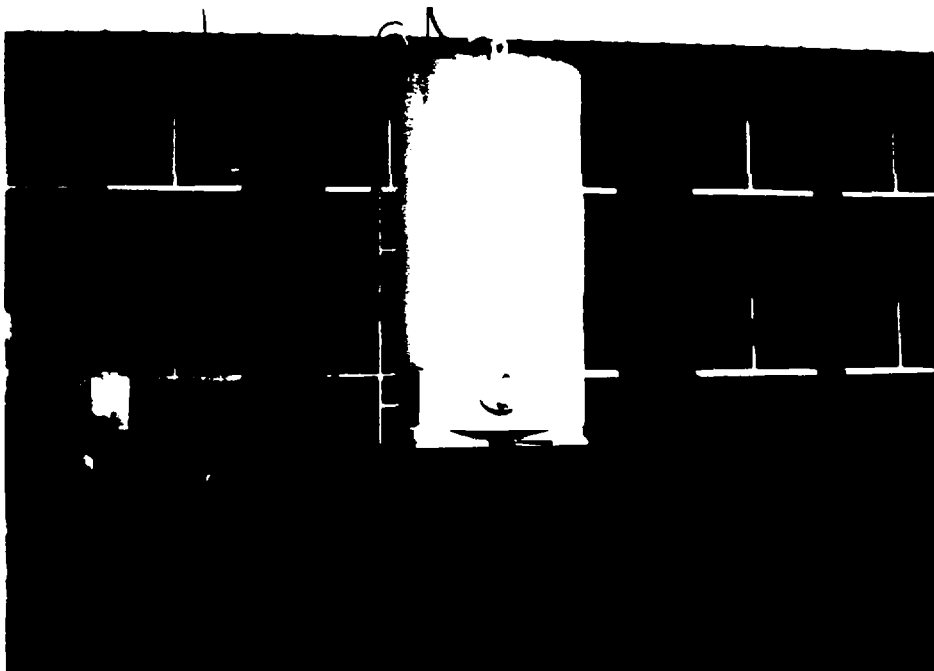


Photo No.: 1
 Orientation: West
 Description: The Dilute Caustic Sludge Aboveground Storage Tank (AST) located near the northeast corner of the paint manufacturing plant.

Location: SWMU 1
 Date: September 9, 1992

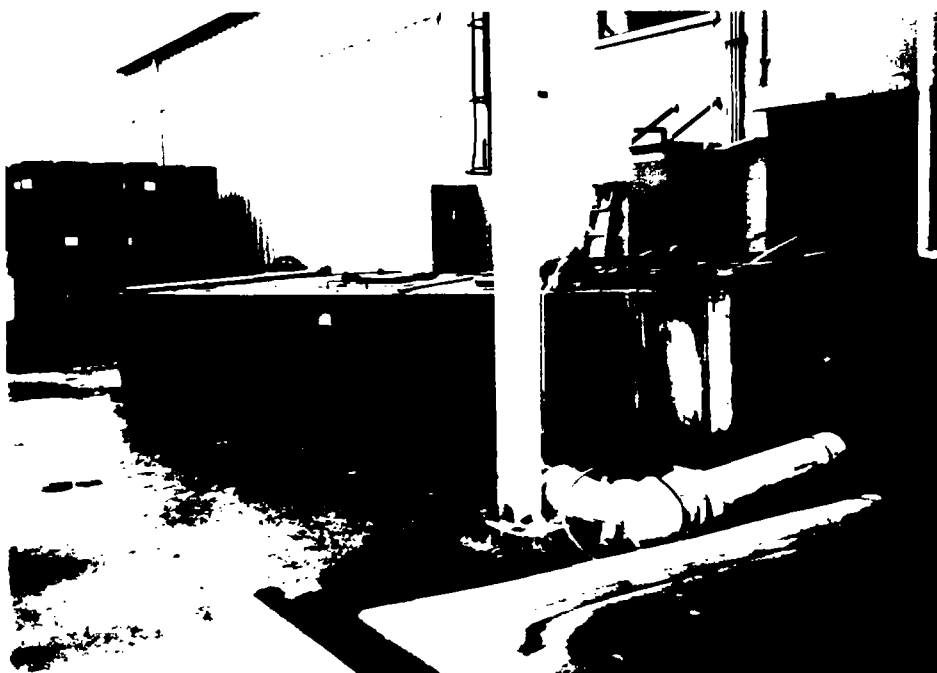


Photo No.: 2
 Orientation: Northeast
 Description: The Dilute Caustic Sludge Bin located immediately west of the resin manufacturing plant.

Location: SWMU 2
 Date: September 9, 1992

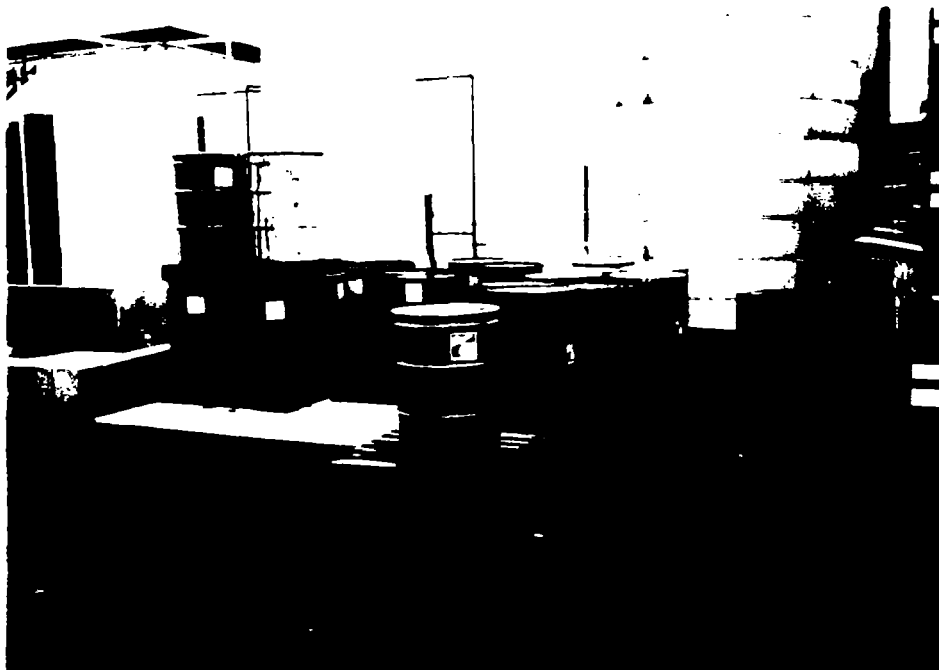


Photo No.: 3
 Orientation: East
 Description: The Drummed Waste Storage Area located in the northwest portion of the facility. Note the hazardous wastes are stored on the left side of the unit in the area marked in yellow and the nonhazardous wastes are stored on the right side of the unit.

Location: SWMU 3
 Date: September 9, 1992

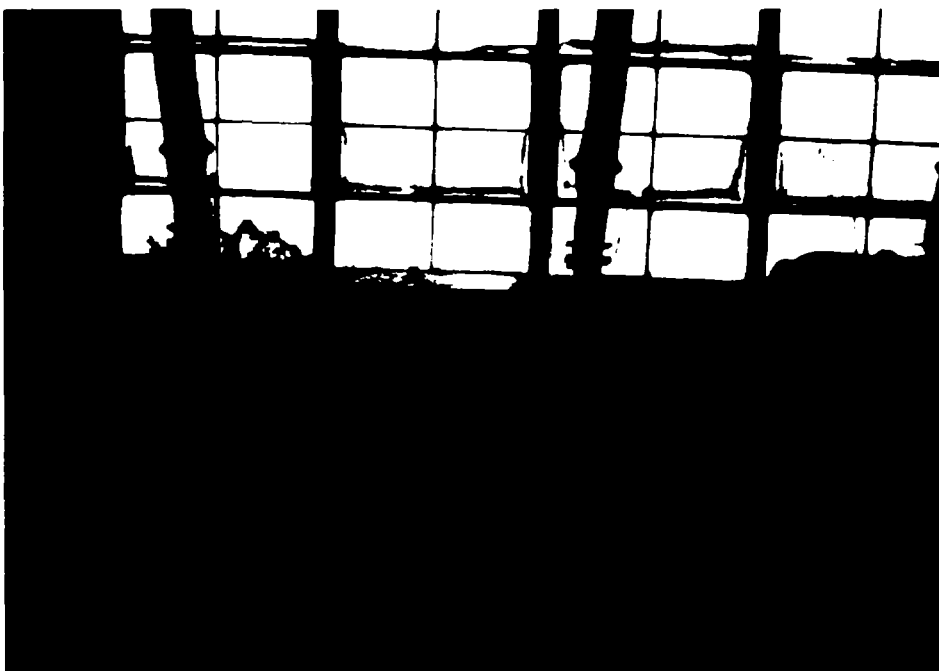


Photo No.: 4
 Orientation: North
 Description: Two of three Baghouse Collection Drums located in the paint manufacturing plant.

Location: SWMU 4
 Date: September 9, 1992

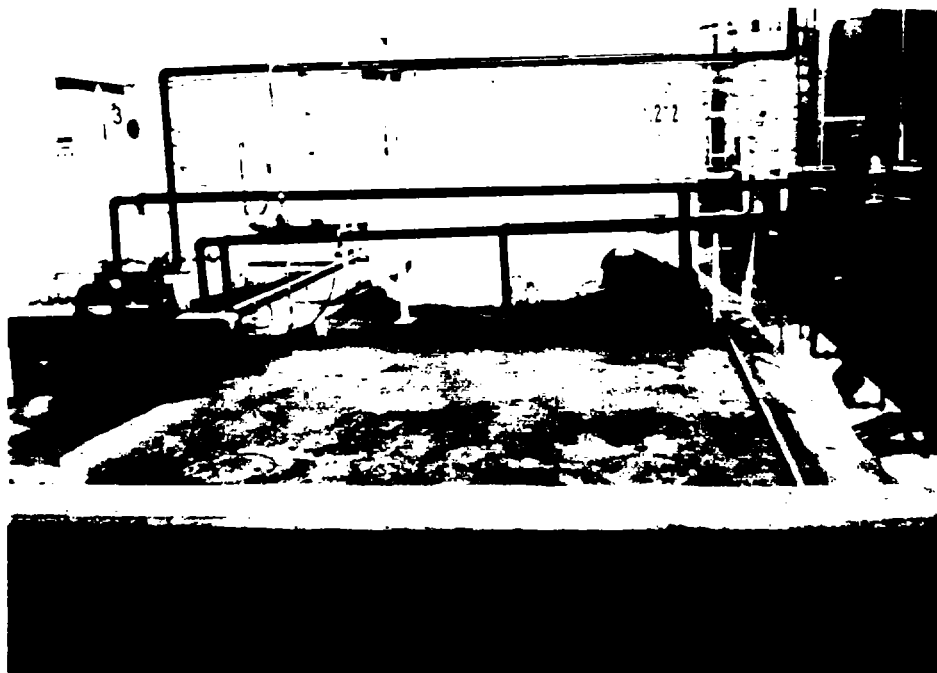


Photo No.: 5
 Orientation: North
 Description: The Former Dilute Caustic Sludge AST Location, located in the south portion of the tank farm at the facility.

Location: SWMU 6
 Date: September 9, 1992



Photo No.: 6
 Orientation: Northeast
 Description: The area where the Former Dilute Caustic Sludge Bin was located prior to the early 1970s to

Location: SWMU 7
 Date: September 9, 1992

END OF PHOTOGRAPHS

ATTACHMENT C
VISUAL SITE INSPECTION
FIELD NOTES

9/9/92 9:00 AM

for 4th & 2nd Hall, Dynamac
- arrive at Benjamin Moore facility

met by G.R. Oachowski,
Divisional Operations Mgr.

Henry Plouffe,
Plant Operations Mgr.

Donald W. Everett, Jr.
Divisional VP

Heavy Rain, approx 70°F

This facility is division of
Benjamin Moore.

Central Division covers 26 states
in middle of country.

gon

9/9/92

32

Benjamin Moore owns 17 acres -
including 2 or 3 generated by
Technical College; 7 or 8 acres
is pending.

BM operates out of 2 Bldgs -
about 200 employees - about
85 factory - rest office.

totally fenced - electronic 24-hour
monitoring.

BM began operations in 1952;
surest property was farmland
c 1952, but not sure.

BM mfg "trade sale paint"
- house paints

- mfg resins - water & solvent based
& enamel paints

of 2

9/9/92

currently generated regulated as
large-quantity generated

boundaries - 25th Ave. to ^{East} South
North Ave. to South,
Salt Line RR to NW.

storm water runoff sewer
monitored - continuous monitor -
discharge to Silver Creek -
just N of facility - eventually,
discharges into Des Plaines River

1 documented release - 1988 -

leaky valve in tank farm -
~ 100 gallons - on concrete pad -
- some dirt from southern side -
27 drums shipped off site
xylol (xylene)

gon

9/9/92

formerly 3 USTs -

1 kerosene; 1 gas; 1 No. 2 fuel oil
- will load out reports

sanitary discharge to Mahone
Pond - greater MSD of Chicago

No CERCLA activity at facility

Air Insp.
IEPA did SET in August 1992 -
normally annual inspection -
sometimes skip a year

boundaries: south of North -

- Ford Dealer: Al Pionini -

East of Zenith - North -

Belt Line RR & Alberta facility;

& gravel company & small municipal
pump off N/W corner

90

9/9/82 Technical Contingency employees about
30 people - make blended contingency
-blending operation

nearest residences about 1/4 mile
southeast;

6 ASTs - raw oil for paint
Blending

11 solvent ASTs

Triton 405 tank - wetting agent

1 sludge AST

Tech Contingency has 3 separate
product ASTs

90

9/9/92 Processes

Mfg is in 1 B. 3-story

3rd floor - mixing dept -
various tanks - mix paste -

add liquid & pigments to make
paste -

paste goes to 2nd floor -
some (≈ 20%) milled

2nd floor - batch through - more
liquids added (either solvents, oils,
etc.)

Latex - latex, water & additives

→ in tank with agitation (slow speed)

past colors matched on floor 2

~~grd~~

9/9/92

filling operation on 1st floor -

series of hand piping - paint
filled into:

5-gal

2-gal

1-gal → main unitsquart

pint

1/2 pint

55-gal

when batch finished:

Latex - collected in 55-gal drum
 - re-used or made up. 98% of
 latex charge re-used

solvent-based - tanks/pipes - collected
 in 5-gal bucket & re-used or
 made up

gnd

9/9/92

Solvent was formerly removed & processed in steam distillation units - generated water, thicken & sludge.

water, thicken re-used
sludge was

phase-out of steam distillation
units began May 1991.

still sludge was pumped
to 7,500 gal sludge AST.

Canatic cleaning system on 2nd
floor changed in batch -
sent to sludge tanks

9/9/92

same processes in vehicle plants -
2,700 gal steel bin - same waste
as sludge AST

sludge AST & sludge bin manage
about 50% solvent; 50% caustic

Sludge AST in use since about
mid-1980s - replaced bin in
same area.

prior to mid-1980s; sludge
tank was located in tank farm
area.

Other wastes: only "bad batches"

- would be drummed.

gcr

9/9/92

40

Red Batch would yield 1-2,000 gals.

Rejects Batch - 55-gal to 2,500 gals

Trunks & cables hand-maintained
by Ryker over Trunkers only.

baghouse - connected to 3rd floor
mixing - drops into 55-gal
drum - average about 1.5 drums/mo.
drum handled in compressor ac.
mean. waste - carbonates & silicates

no chromium or lead

resin "Incinerator" - air pollution
control at vehicle plants

~~gon~~

9/9/92

"Dilute Caustic Sludge" -

main waste

ACRA Cont. A designated SO₂ & SO₃ -

- sludge tank / bins (2)

+ area where was house in now.

- was paved.

Drum Storage Area - paved -

since 2 1970 in use until 4/89

- waste drum area was 2 35' x 50'

average capacity of waste drums
was up to 30-40 drums.

- about 1970

Bin 1 - in use since mid-1980s -

2,700-gallon capacity - closed top

bin - steel - currently in use - on
concrete pad

gwh

9/9/92

Shady AST - mid 1980s - steel tank
concrete pad - 7,500-gal tank, at
least 7,500-gal capacity.

- moved from former area

- was in tank farm area - used
there from ~ 1976/8 to mid 80s

→ replaced tank - ~ 2,000 gallons
tank - tank in use since mid-late 1970s

former gas

10:50 - broke for coffee/refreshment
prior to walk through

11 AM - began walk through

~~gas~~

9/9/92

Photo 1 - N/E

- 2, 700-gal concrete bins

(0030, 0038)

Photo 2 - N

former concrete tank location

Photo 3 - N/E

~ 12-15 drum storage areas

9-man-hay

16-hay

Photo 4 - N/E. old-old

sludge bin area (<1970)

Photo 5 - N/E - N

sludge AST

JON

9/9/92 Photo 6 - S/W

- Distillation Unit

Photo 7 - N

3 baghouse drums

11:40 - completed walk-through

- > received add'l docs. -
- ✓ & -> spill remediation docs.
- N -> tank maps
- N -> UST removal rpt - N/A
- N -> air permits
- N -> TCLP - sludge
- N -> annual reports

gm

SET Regional is transporter
of all bay waste (sludge) -

Sludge
x-joint to Heritage - with
Tachanigola in Charlotte, SC

Same to "Trenton One" - Houston, TX

Chamie Regional - transporter
main waste to Green Valley LF.
Naperville

West Ellenton - since facility began
- 1950

12:20 - closing conference

12:30 - left facility

~~gdn~~